

EXHIBIT A

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DAVID GOLDSTINE,

Plaintiff,

v.

FEDEX FREIGHT, INC., a Washington State
entity; "DOE(S) 1-100", employees of
FEDEX FREIGHT, INC.; and
CORPORATION(S) XYZ 1-100,

Defendants.

Case No. 2:18-cv-01164 MJP

**PLAINTIFF'S FIRST SET OF
INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO
DEFENDANT FEDEX FREIGHT,
INC.**

REQUESTING PARTY: Plaintiff DAVID GOLDSTINE

RESPONDING PARTY: Defendant FEDEX FREIGHT, INC.

SET NO.: ONE

Plaintiff David Goldstine, in his individual capacity herein, hereby serves these Interrogatories and Request for Production upon Defendant FedEx Freight, Inc. These Interrogatories are served upon you in accordance with Federal Rules of Civil Procedure 33 and 34. Your attention is directed to Fed. R. Civ. P. 26(e) regarding your continuing duty to supplement your answers herein. Answer in the spaces provided (using additional sheets as needed), and verify your answers under oath, signing on the last page. The original of your

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO DEFENDANT FEDEX
FREIGHT, INC. - 1**

Case No. 2-18-cv-01164 MJP

AKW LAW, P.C.
6100 219th St. SW, Suite 480
Mountlake Terrace, WA 98043
Tel. (206) 259-1259 / Fax (855) 925-9529

1 answers, signed by you, are to be returned to the undersigned attorney within 30 days of service
2 of these Interrogatories upon you.

3 ***THIS IS ALSO A REQUEST FOR PRODUCTION, PURSUANT TO FEDERAL***
4 ***RULE OF CIVIL PROCEDURE 34.***

5 Please produce requested items for inspection and copying at the offices of Ada K.
6 Wong, AKW LAW, P.C., 6100 219th St. SW, Suite 480, Mountlake Terrace, WA 98043, thirty
7 (30) days from the date of service of this set of Interrogatories and Request for Production
8 upon you.

9 Be advised that the Interrogatories and Request for Production herein apply to all
10 information and items within your knowledge or control, and that of your attorneys, agents,
11 representatives and other persons acting on your behalf. Answer each interrogatory as fully as
12 possible within the time limit, and furnish additional information when it becomes available.

13 If there are any additions, deletions or changes in the answers or information provided
14 at any time prior to trial, you are specifically directed to immediately so inform Plaintiffs'
15 counsel. If additional information is discovered between the time of making these answers and
16 the time of trial, these interrogatories are directed to that information. If such information is
17 not seasonably furnished within a reasonable time prior to trial, the undersigned will move at
18 or before trial to exclude from evidence any such information known to you or in your
19 possession or that of your attorneys, agents, liability insurers, and others acting on your behalf,
20 and will request other appropriate sanctions.

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DEFINITIONS

As used herein:

1. **Communication.** The term “communication” means any oral or written expression or exchange of information by speech, writing, or conduct including, but not limited to, in-person conversations, telephone conversations, correspondence, email messages, text messages, electronic instant messages, social media messages, and all other forms of communication.

2. **Document.** The term "document" shall be used in its broadcast sense as permitted by Federal Rules of Civil Procedure 26 and 34 and means all writings of every kind including, but not limited to, the original or any legible copy of all records, letters, correspondence, appointment books, diaries, files, notes, statements, memoranda or minutes of meetings, conferences and telephone calls, emails, faxes, receipts, written reports or opinions of investigators or experts, status reports, drawings, charts, photographs, negatives, brochures, lists, schedules, manuals, technical notes or standards, expense accounts, financial statements or audit reports, however produced or reproduced, within your possession or subject to your control, of which you have knowledge or to which you now have or previously had access. The term “document” includes drafts and copies that are not identical duplicates of the originals, and copies of documents, the originals of which are not in your possession, custody, or control.

3. **Identity of Individuals.** Where the name or identity of an individual person is requested, or where the term "identify" is used in reference to an individual person, please state with respect to each such person:

a. Full name;

- 1 b. Current or last known residence address, and telephone number;
- 2 c. Current or last known business address and telephone number;
- 3 d. All known email addresses;
- 4 e. Current position or occupation;
- 5 f. Employer;
- 6 g. His or her present whereabouts and his or her present employment
- 7 position and business affiliation at the time in question; and,
- 8 h. Relationship to you.

9 Unless it otherwise appears from the context, a request for the identity of a person
10 relates to all persons in such classification or category.

11 4. ***Identity of Document.*** The term "identify", when used in reference to a
12 document, means to state with respect to each document:

- 13 a. Title of document;
- 14 b. The date of preparation of the document;
- 15 c. The name and title of each author, sender, creator and initiator of such
- 16 document;
- 17 d. The name and title of recipient, addressee, or party for whom such
- 18 document was intended (if any);
- 19 e. The nature of the document (e.g., letter, memorandum, tape) and other
- 20 means of identification sufficient to identify the document for purposes of a request for
- 21 production, and to further state its present location and custodian;
- 22 f. Source from whom or from which you obtained the document;
- 23 g. Number of pages the document comprises;

1 h. Production number(s); and,

2 i. If any such document was, but no longer is, in your possession or
3 custody or subject to your control, describe what disposition was made of it, and give the name,
4 address and telephone number of the person presently having possession, custody or control of
5 the document.

6 5. ***Identity of Entity.*** The term "identify", when used in reference to an entity
7 other than a natural person, means to state with respect to each such entity:

8 a. Full legal name or title;

9 b. Form of business (i.e. profit corporation, partnership);

10 c. Complete business location and mailing address;

11 d. Telephone and facsimile numbers;

12 e. State of incorporation or juridical organization;

13 f. Address of headquarters of principal place of business; and,

14 g. Relationship to you.

15 6. ***Knowledge or Information.*** Where your knowledge or information in your
16 possession is requested, that request includes knowledge of your agents, representatives,
17 employees and attorneys. When the answer is made by a corporate defendant, the name,
18 address and title of the person supplying the information and the source of such person's
19 information must be included as well.

20 7. ***Sources of Information.*** The phrase "state the source of your information"
21 means to identify the person and the documents from which the information was obtained
22 where your answers are not based upon your own first-hand information.

1 8. **Person.** "Person" means, without limitation, any natural person, proprietorship,
2 companies, firms, corporations, partnerships, limited liability companies, independent
3 contractors, groups, associations, joint ventures, associations, trusts, estates, communities,
4 agencies, institutions, labor unions, or any form of business, social or legal entity, including
5 governmental subdivisions.

6 9. **You/Defendant.** "You" means Defendant FedEx Freight, Inc., located at 6414
7 Hardeson Road, Everett, Washington 98203, and its attorneys, agents, employees, officers,
8 representatives, adjusters, investigators and all other persons who are in possession of or who
9 have obtained information on your behalf.

10 10. **And/or.** "And" or "or" means "and/or," with the singular form being deemed
11 to include the plural and vice versa.

12 11. **"He"** or any other masculine, feminine or neuter pronoun means any
13 individual, regardless of sex or entity, to whom the interrogatory or request for production
14 would otherwise apply.

15 12. **"Relating to"** means to be relevant in any way to the subject matter in
16 questions, including without limitation all information that directly or indirectly contains,
17 describes, records summarizes, evaluates, refers to, is pertinent to, comments upon, or
18 discusses the subject matter or that states the background of, or was the basis for, or that
19 records, evaluates, was referred to, relied upon, used generated, transmitted, or receive din
20 arriving at any conclusion, opinion, estimate, position, decision, belief, or assertion concerning
21 the subject matter.

13. **“Any”** should be understood in either its most or least inclusive sense as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

14. All documents, including records, files, e-mails, correspondence, and memoranda, stored electronically must be produced in its native format, including all metadata.

15. The use of the singular form of any word includes the plural and vice versa. The masculine includes the feminine and neuter genders. The past tense includes the present tense where the clear meaning is not distorted by change of tense. “And” as well as “or” shall be construed disjunctively or conjunctively as necessary to bring within the scope of the request all responses that otherwise might be construed to be outside the scope. “Include” and “including” and variations thereof shall not be interpreted in terms of limitations but shall be deemed to be followed by the words “without limitation.” “Any” shall be construed as synonymous with “every and “all” and shall be all-inclusive.

These discovery requests shall be deemed to be continuing, and, in the event that you discover information that is responsive to these requests, you are to promptly supplement your answers to these requests.

INSTRUCTIONS

1. **Relevant Time Period:** Unless otherwise noted, the relevant time period for which documents and information are requested is **February 1, 2015 to present.**

2. **Scope:** This Request requests production of information and documents that are in your possession, custody, or control, including documents in the possession of your employees, agents, independent contractors, representatives, and attorneys, unless privileged.

1 3. **Objections:** If you object to the information requested by any interrogatory or
2 request for production in whole or in part, or contend that any identified document or
3 information would be excluded from production in discovery, state the reasons for such
4 objections or ground for exclusion, and identify each person having knowledge or the factual
5 basis, if any, on which the objection, privilege, or other ground is asserted.

6 4. **Privileged Documents:** If any document is withheld under claim of privilege,
7 identify the document and state the basis for the privilege, and provide a detailed privilege log
8 that contains at least the following information for each document that you have withheld: (a)
9 the name of each author, writer, sender, creator, or initiator of such document; (b) the name of
10 each recipient, addressee, or party for whom such document was intended or to whom it was
11 sent; (c) the date of such document, or an estimate thereof if no date appears on the document;
12 (d) the general subject matter of the document; and (e) the claimed grounds for withholding
13 the document, including but not limited to the nature of any claimed privilege and grounds in
14 support thereof.

15 5. **Documents No Longer in Possession of Respondent/Destroyed Documents:**
16 If any responsive document is no longer in your possession, custody or control, produce a
17 description of each such document. The description shall include the following:

- 18 a. Name of each author, sender, creator, and initiator of such document;
19 b. Name of each recipient, addressee, or party for whom such document
20 was intended;
21 c. Date the document was created;
22 d. Date(s) the document was in use;
23 e. Detailed description of the content of the document;

f. Reason it is no longer in your possession, custody, or control; and,

g. Current location of the document.

6. **Duty to Supplement:** The Request imposes a continuing duty on you to produce promptly any responsive document, information, or item that comes into your knowledge, possession, custody, or control after your initial production of responses to the requests. You are also required to amend your responses if you discover a previous response was incorrect or incomplete.

DATED SEP 24 2018.

AKW LAW, P.C.



Ada K. Wong, WSBA #45936
Attorney for Plaintiff
6100 219th St. SW, Suite 480
Mountlake Terrace, WA 98043
Tel.: (206) 259-1259
Fax: (855) 925-9529
Email: ada@akw-law.com

INTERROGATORIES

INTERROGATORY NO. 1:

Please identify all persons who were consulted or who assisted in answering these discovery requests, or who furnished information which was used in answering them, including names, address, telephone numbers, and relationship with Defendant FEDEX FREIGHT, INC.

ANSWER:

INTERROGATORY NO. 2:

Identify each person having knowledge of any damages claimed by Plaintiff DAVID GOLDSTINE, and please provide each identified person's address, phone number, and the substance of their knowledge.

ANSWER:

INTERROGATORY NO. 3:

Has Defendant FEDEX FREIGHT, INC. been a party to any lawsuits involving claims or allegations of disability discrimination, wrongful termination, and/or constructive discharge, in the past five (5) years? If so, provide the names, parties, and cause number, a description of the nature of the lawsuit, and the outcome of the lawsuit.

ANSWER:

1 **INTERROGATORY NO. 4:**

2 Please identify all individuals who were Plaintiff DAVID GOLDSTINE's managers
3 and supervisors at Defendant FEDEX FREIGHT, INC. including each identified individual's
4 full name, all position title(s), dates of employment, and reason for separation, if separated.

5 **ANSWER:**

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8 **INTERROGATORY NO. 5:**

9 Please identify all agents, personnel, staff, contractors, and/or employees in Defendant
10 FEDEX FREIGHT, INC.'s Human Resources department and/or who have whole or partial
11 duties as a Human Resources personnel during Plaintiff DAVID GOLDSTINE's employment
12 with Defendant FEDEX FREIGHT, INC., and please provide each identified individual's full
13 name, position title(s), dates of employment, reason for separation, and job description/duties
14 and responsibilities.

15 **ANSWER:**

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18 **INTERROGATORY NO. 6:**

19 Please identify all past and current employees, staff, and/or independent contractors in
20 the position of "Road Driver" and/or who have had whole or partial duties as a Road Driver
21 with Defendant FEDEX FREIGHT, INC. in the last five (5) years, including each identified
22 individual's full name, position title(s), dates of employment, reason for separation, rate of
23 pay, and job description/duties and responsibilities.

1 **ANSWER:**

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4 **INTERROGATORY NO. 7:**

5 Please identify all of Defendant FEDEX FREIGHT, INC.'s trainings, materials,
6 handbooks, policies, procedures, manuals, guidelines, bulletins, notes, memoranda, letters, and
7 e-mails regarding, related to, and/or referring to health and safety training for the last seven (7)
8 years.

9 **ANSWER:**

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12 **INTERROGATORY NO. 8:**

13 Please identify all of Defendant FEDEX FREIGHT, INC.'s trainings, materials,
14 handbooks, policies, procedures, manuals, guidelines, bulletins, notes, memoranda, letters, and
15 e-mails regarding, related to, and/or referring to certification requirements for the last seven
16 (7) years.

17 **ANSWER:**

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20 **INTERROGATORY NO. 9:**

21 Please identify all of Defendant FEDEX FREIGHT, INC.'s trainings, materials,
22 handbooks, policies, procedures, manuals, guidelines, bulletins, notes, memoranda, letters, and
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1 e-mails regarding, related to, and/or referring to discrimination on the basis of an actual or
2 perceived disability for the last seven (7) years.

3 **ANSWER:**
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6 **INTERROGATORY NO. 10:**

7 Please identify all of Defendant FEDEX FREIGHT, INC.'s trainings, materials,
8 handbooks, policies, procedures, manuals, guidelines, bulletins, notes, memoranda, letters, and
9 e-mails regarding, related to, and/or referring to retaliation for protected activities related to
10 discrimination on the basis of an actual or perceived disability for the last seven (7) years.

11 **ANSWER:**
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14 **INTERROGATORY NO. 11:**

15 Please identify all of Defendant FEDEX FREIGHT, INC.'s trainings, materials,
16 handbooks, policies, procedures, manuals, guidelines, bulletins, notes, memoranda, letters, and
17 e-mails regarding, related to, and/or referring to reasonable accommodation of disabled
18 employees for the last seven (7) years.

19 **ANSWER:**
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22 **INTERROGATORY NO. 12:**
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1 Please identify all of Defendant FEDEX FREIGHT, INC.'s trainings, materials,
2 handbooks, policies, procedures, manuals, guidelines, bulletins, notes, memoranda, letters, and
3 e-mails regarding, related to, and/or referring to vehicle maintenance, repairs, and vehicle
4 safety procedures for drivers for the last five (5) years.

5 **ANSWER:**

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8 **INTERROGATORY NO. 13:**

9 Please identify all of Defendant FEDEX FREIGHT, INC.'s trainings, materials,
10 handbooks, policies, procedures, manuals, guidelines, bulletins, notes, memoranda, letters, and
11 e-mails offered to Defendant FEDEX FREIGHT, INC.'s employees, agents, independent
12 contractors, staff, and/or personnel who have whole or partial duties as a road driver for the
13 last five (5) years.

14 **ANSWER:**

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17 **INTERROGATORY NO. 14:**

18 If Defendant FEDEX FREIGHT, INC. had any communications, in any form, with any
19 person (excluding its attorneys), regarding the matters alleged in Plaintiff DAVID
20 GOLDSTINE's Complaint, state:

- 21 (a) The identity of the person(s) with whom such communications were made;
22 (b) What was said to the person(s) identified in subsection (a); and
23 (c) The date and form (written or oral) of each such communications.

1 **ANSWER:**

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4 **INTERROGATORY NO. 15:**

5 Identify each person that FEDEX FREIGHT, INC. or its attorneys expect to testify at
6 trial as an expert witness, and for each such witness, state:

- 7 (a) The subject matter on which the expert is expected to testify;
8 (b) The substance of the facts and opinions to which the expert will testify; and
9 (c) A summary of the grounds for each such opinion.

10 **ANSWER:**

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13 **INTERROGATORY NO. 16:**

14 Please identify all Defendant FEDEX FREIGHT, INC.'s employees, agents,
15 independent contractors, staff, and/or personnel, including full names, position titles, job
16 responsibilities and/or duties, rate of pay, dates of employment, reason for decertification, last
17 known e-mail address(es), last known telephone number(s), and last known physical
18 address(es) for the last five (5) years who held the same or similar position, duties or
19 responsibilities of Plaintiff DAVID GOLDSTINE and have been decertified at any time (as
20 used herein, the term "decertified" refers to the practice of prohibiting a "Road Driver" or other
21 employee from driving for Defendant FEDEX FREIGHT, INC.).

22 **ANSWER:**

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INTERROGATORY NO. 17:

Please identify whether Plaintiff DAVID GOLDSTINE correctly named Defendant FEDEX FREIGHT, INC. in this matter and identify any other entities that employed Plaintiff as related to Defendant FEDEX FREIGHT, INC.

ANSWER:

INTERROGATORY NO. 18:

Please describe in detail the communication that took place between Randy Mott and Plaintiff DAVID GOLDSTINE on or about April 7, 2017 regarding Plaintiff DAVID GOLDSTINE's failure to close the damaged door on the truck he was assigned to drive to Portland, Oregon on or about April 6, 2017.

ANSWER:

INTERROGATORY NO. 19:

Please describe in detail the reasons Plaintiff DAVID GOLDSTINE was decertified at any time during his employment with Defendant FEDEX FREIGHT, INC. and include:

- (a) All dates of decertification;
- (b) Method(s) of communication in which Plaintiff was notified of decertification;
- and

1 (c) Person(s) and Title(s) of Person(s) who communicated said notification of
2 decertification to Plaintiff.

3 **ANSWER:**

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6 **INTERROGATORY NO. 20:**

7 Please identify all documents regarding and/or referring to certification provided by or
8 on behalf of Plaintiff DAVID GOLDSTINE to Defendant FEDEX FREIGHT, INC., including
9 all dates when Defendant received each certification.

10 **ANSWER:**

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13 **INTERROGATORY NO. 21:**

14 Please identify each certification (and all attempts of certification) provided by or on
15 behalf of Plaintiff DAVID GOLDSTINE to Defendant FEDEX FREIGHT, INC. that was
16 rejected, including the following:

- 17 (a) Detailed reason for each rejection;
18 (b) Date of each rejection;
19 (c) Method of communication of rejection by Defendant FEDEX FREIGHT, INC.
20 to Plaintiff DAVID GOLDSTINE; and
21 (d) Person(s) and Title(s) of Person(s) who communicated notification of
22 decertification to Plaintiff DAVID GOLDSTINE.

23 **ANSWER:**

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INTERROGATORY NO. 22:

Please describe in detail the communication between Plaintiff DAVID GOLDSTINE and Christy Tayman that occurred on or about April 18, 2017 regarding Plaintiff DAVID GOLDSTINE’s alleged “disqualifying condition.”

ANSWER:

INTERROGATORY NO. 23:

Please describe in detail the reasons Plaintiff DAVID GOLDSTINE was “parked” (as used herein, the term “parked” refers to the practice of prohibiting a “Road Driver” or other employee from driving for Defendant FEDEX FREIGHT, INC.) at any time during his employment with Defendant FEDEX FREIGHT, INC. and include:

- (a) All dates during which Plaintiff DAVID GOLDSTINE was “parked”;
- (b) Method(s) of communication in which Plaintiff DAVID GOLDSTINE was notified that he was “parked”; and
- (c) The names and position titles of said individual(s) who communicated said notification of being “parked” to Plaintiff DAVID GOLDSTINE.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

Please produce a copy of all documents, notes, audio or video recordings, correspondence, memoranda, e-mails, letters, files or other communications maintained by Defendant FEDEX FREIGHT, INC.'s Human Resources and/or personnel department regarding, referring to, and/or related to Plaintiff DAVID GOLDSTINE for the last five (5) years.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2:

Please produce all trainings, materials, handbooks, policies, procedures, manuals, guidelines, bulletins, notes, memoranda, letters, and e-mails regarding, related to, and/or referring to health and safety training at Defendant FEDEX FREIGHT, INC. for the last seven (7) years.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3:

Please produce all trainings, materials, handbooks, policies, procedures, manuals, guidelines, bulletins, notes, memoranda, letters, and e-mails regarding, related to, and/or referring to certification requirements at Defendant FEDEX FREIGHT, INC. for the last seven (7) years.

1 **RESPONSE:**

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4 **REQUEST FOR PRODUCTION NO. 4:**

5 Please produce all trainings, materials, handbooks, policies, procedures, manuals,
6 guidelines, bulletins, notes, memoranda, letters, and e-mails regarding, related to, and/or
7 referring to discrimination on the basis of an actual or perceived disability at Defendant
8 FEDEX FREIGHT, INC. for the last seven (7) years.

9 **RESPONSE:**

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12 **REQUEST FOR PRODUCTION NO. 5:**

13 Please produce all trainings, materials, handbooks, policies, procedures, manuals,
14 guidelines, bulletins, notes, memoranda, letters, and e-mails regarding, related to, and/or
15 referring to retaliation for protected activities related to discrimination on the basis of an actual
16 or perceived disability at Defendant FEDEX FREIGHT, INC. for the last seven (7) years.

17 **RESPONSE:**

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20 **REQUEST FOR PRODUCTION NO. 6:**

21 Please produce all trainings, materials, handbooks, policies, procedures, manuals,
22 guidelines, bulletins, notes, memoranda, letters, and e-mails regarding, related to, and/or
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1 referring to reasonable accommodation of disabled employees at Defendant FEDEX
2 FREIGHT, INC. for the last seven (7) years.

3 **RESPONSE:**

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6 **REQUEST FOR PRODUCTION NO. 7:**

7 Please produce all trainings, materials, handbooks, policies, procedures, manuals,
8 guidelines, bulletins, notes, memoranda, letters, and e-mails regarding, related to, and/or
9 referring to vehicle maintenance, repairs, and vehicle safety procedures for drivers at
10 Defendant FEDEX FREIGHT, INC. for the last seven (7) years.

11 **RESPONSE:**

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14 **REQUEST FOR PRODUCTION NO. 8:**

15 Please produce a copy of all documents Defendant FEDEX FREIGHT, INC. has
16 presented to Plaintiff DAVID GOLDSTINE for signature, or prepared for Plaintiff DAVID
17 GOLDSTINE's signature, including but not limited to agreements, disciplinary notices,
18 releases, offers, contracts, correspondence, and certifications or rejection of certifications,
19 including all drafts, in native format.

20 **RESPONSE:**

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23 **REQUEST FOR PRODUCTION NO. 9:**

1 Please produce all investigations, including conclusions, correspondence, memoranda,
2 notes, text messages, audio and video recordings, findings, statements, interviews, etc.,
3 regarding complaints related to health and safety training by employees, agents, and/or
4 independent contractors of Defendant FEDEX FREIGHT, INC. for the last five (5) years.

5 **RESPONSE:**

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8 **REQUEST FOR PRODUCTION NO. 10:**

9 Please produce all investigations, including conclusions, correspondence, memoranda,
10 notes, text messages, audio and video recordings, findings, statements, interviews, etc.,
11 regarding complaints related to certification requirements by employees, agents, and/or
12 independent contractors of Defendant FEDEX FREIGHT, INC. for the last five (5) years.

13 **RESPONSE:**

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16 **REQUEST FOR PRODUCTION NO. 11:**

17 Please produce all investigations, including conclusions, correspondence, memoranda,
18 notes, text messages, audio and video recordings, findings, statements, interviews, etc.,
19 regarding complaints of discrimination and on the basis of an actual or perceived disability by
20 employees, agents, and/or independent contractors of Defendant FEDEX FREIGHT, INC. for
21 the last five (5) years.

22 **RESPONSE:**

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2 **REQUEST FOR PRODUCTION NO. 12:**

3 Please produce all investigations, including conclusions, correspondence, memoranda,
4 notes, text messages, audio and video recordings, findings, statements, interviews, etc.,
5 regarding complaints of retaliation for protected activities related to discrimination on the basis
6 of an actual or perceived disability by employees, agents, and/or independent contractors of
7 Defendant FEDEX FREIGHT, INC. for the last five (5) years.

8 **RESPONSE:**

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11 **REQUEST FOR PRODUCTION NO. 13:**

12 Please produce all investigations, including conclusions, correspondence, memoranda,
13 notes, text messages, audio and video recordings, findings, statements, interviews, etc.,
14 regarding complaints regarding failure to provide reasonable accommodations to disabled
15 employees, agents, and/or independent contractors of Defendant FEDEX FREIGHT, INC. for
16 the last five (5) years.

17 **RESPONSE:**

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20 **REQUEST FOR PRODUCTION NO. 14:**

21 Please produce all investigations, including conclusions, correspondence, memoranda,
22 notes, text messages, audio and video recordings, findings, statements, interviews, etc.,
23 regarding complaints about vehicle maintenance, repairs, and vehicle safety procedures by

1 employees, agents, and/or independent contractors of Defendant FEDEX FREIGHT, INC. for
2 the last five (5) years.

3 **RESPONSE:**

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6 **REQUEST FOR PRODUCTION NO. 15:**

7 Please produce any non-privileged documents or material things Defendant FEDEX
8 FREIGHT, INC. has obtained and/or sent to any third party relating to this matter, including
9 but not limited to requests for information or documents received from Plaintiff DAVID
10 GOLDSTINE, public agencies, governments, private agencies, records requests, documents
11 obtained from your employees, independent contractors or agents, bookkeepers, accountants,
12 and payroll management.

13 **RESPONSE:**

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16 **REQUEST FOR PRODUCTION NO. 16:**

17 Please produce a copy of any and all documents identified in Defendant FEDEX
18 FREIGHT, INC.'s answer to Interrogatory No. 13.

19 **RESPONSE:**

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22 **REQUEST FOR PRODUCTION NO. 17:**

23 For each expert identified in Interrogatory No. 15, please produce:

1 (a) The expert's complete file in this case, including, without limitation, all notes,
2 reports, drafts of reports or other documents relating to communications and
3 correspondence with counsel or other concerning this case.

4 (b) A list of all publications authored, in whole or in part, by the expert within the
5 preceding ten years, as well as copies of the publications, per se.

6 (c) Any and all documents contained data or other information considered by the
7 expert in forming his/her opinions.

8 (d) Any exhibits to be used as a summary of or support for the opinions.

9 **RESPONSE:**
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12 **REQUEST FOR PRODUCTION NO. 18:**

13 Please produce any and all documents that in any way refer to, relate to, support, or
14 contradict the information described in Defendant FEDEX FREIGHT, INC.'s answer to
15 Interrogatory No. 18.

16 **RESPONSE:**
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19 **REQUEST FOR PRODUCTION NO. 19:**

20 Please produce any and all documents that in any way refer to, relate to, support, or
21 contradict the information identified in Defendant FEDEX FREIGHT, INC.'s answer to
22 Interrogatory No. 19.

23 **RESPONSE:**

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REQUEST FOR PRODUCTION NO. 20:

Please produce a copy of any and all documents identified in Defendant FEDEX FREIGHT, INC.'s answer to Interrogatory No. 20.

RESPONSE:

REQUEST FOR PRODUCTION NO. 21:

Please produce a copy of any and all documents identified in Defendant FEDEX FREIGHT, INC.'s answer to Interrogatory No. 21.

RESPONSE:

REQUEST FOR PRODUCTION NO. 22:

Please produce any and all documents that in any way refer to, relate to, support, or contradict the information provided in Defendant FEDEX FREIGHT, INC.'s answer to Interrogatory No. 22.

RESPONSE:

REQUEST FOR PRODUCTION NO. 23:

Please produce any and all documents that in any way refer to, relate to, support, or

1 contradict the information provided in Defendant FEDEX FREIGHT, INC.'s answer to
2 Interrogatory No. 23.

3 **RESPONSE:**

4
5
6 Dated SEP 24 2018.

7 **AKW LAW, P.C.**

8 
9 _____

10 Ada K. Wong, WSBA #45936
11 Attorney for Plaintiff
12 6100 219th St. SW, Suite 480
13 Mountlake Terrace, WA 98043
14 Tel.: (206) 259-1259
15 Fax: (855) 925-9529
16 E-mail: ada@akw-law.com

ATTORNEY CERTIFICATION

The undersigned counsel for defendant hereby certifies Defendant's responses pursuant to Fed. R. Civ. P. 26(g).

Dated this _____ day of _____, 2018.

Medora Marisseau, WSBA #28169
Jerrald L. Shivers, TN Bar #036391
Attorneys for Defendant FedEx Freight, Inc.

DECLARATION OF RESPONDING PARTY

I declare under the penalty of perjury under the laws of the State of Washington that I am the Defendant in this action OR I am the _____ of _____ and am authorized to make the foregoing answers. I declare that I have read the foregoing answers, know the contents thereof, and believe them to be true and correct.

Dated this _____ day of _____, 2018, at _____, Washington.

Name

Its

Address: _____

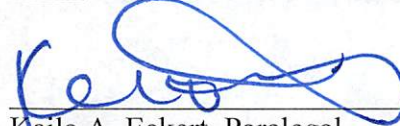
CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On September 24, 2018, I caused a copy of the foregoing **PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT FEDEX FREIGHT, INC.** to be served on the parties listed below in the manner specified below:

Medora A. Marrisseau KARR TUTTLE CAMPBELL 701 Fifth Avenue, Suite 3300 Seattle, WA 98104 E-mail: mmarrisseau@carrtuttle.com	<input type="checkbox"/>	VIA FACSIMILE
Jerrald L. Shivers, TN Bar #036391 FedEx Freight, Inc. 1715 Aaron Brenner Drive, Suite 600 Memphis, TN 38120 E-mail: Jerry.shivers@fedex.com <i>Attorneys for Defendant</i>	<input checked="" type="checkbox"/>	VIA FIRST CLASS U.S. MAIL
	<input type="checkbox"/>	VIA MESSENGER/HAND DELIVERY
	<input checked="" type="checkbox"/>	VIA E-MAIL/E-FILE

Dated this 24th day of September, 2018, at Mountlake Terrace, Washington.


Kaila A. Eckert, Paralegal